

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PEGASUS WIRELESS INNOVATION
LLC

Plaintiff,

V.

CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS *et al.*,

Defendants,

ERICSSON INC.,

Intervenor.

CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS *et al.*,

Counterclaim-Plaintiff,

ERICSSON INC.,

Intervenor,

V.

PEGASUS WIRELESS INNOVATION
LLC and KT CORPORATION,

Counterclaim-Defendants.

PEGASUS WIRELESS INNOVATION
LLC

Plaintiff,

V.

AT&T CORP. *et al.*,

Defendants,

ERICSSON INC.,

Intervenor.

CASE NO. 2:23-cv-00640-JRG
(Lead Case)

CASE NO. 2:23-cv-00640-JRG
(Lead Case)

CASE NO. 2:23-cv-00638-JRG
(Member Case)

NEW CINGULAR WIRELESS PCS,
LLC,

Counterclaim-Plaintiff,

ERICSSON INC.,

Intervenor,

V.

PEGASUS WIRELESS INNOVATION
LLC and KT CORPORATION,

Counterclaim-Defendants.

PEGASUS WIRELESS INNOVATION
LLC

Plaintiff,

V.

T-MOBILE USA, INC. *et al.*,

Defendants,

ERICSSON INC.,

Intervenor.

T-MOBILE USA, INC.,

Counterclaim-Plaintiff,

ERICSSON INC.,

Intervenor,

V.

PEGASUS WIRELESS INNOVATION
LLC and KT CORPORATION,

Counterclaim-Defendants.

CASE NO. 2:23-cv-00638-JRG
(Member Case)

CASE NO. 2:23-cv-00639-JRG
(Member Case)

CASE NO. 2:23-cv-00639-JRG
(Member Case)

**COUNTERCLAIM-DEFENDANT KT CORPORATION'S UNOPPOSED MOTION TO
WITHDRAW ITS REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER
FROM NON-JURISDICTIONAL DISCOVERY**

Counterclaim-Defendant KT Corporation (“KT”) moves to withdraw its reply (Dkt. 159) to Defendants’ and Intervenor’s¹ Opposition to KT’s Motion for a protective order seeking relief from non-jurisdictional discovery. Defendants and Intervenor are unopposed.

Dated: October 28, 2024

Respectfully submitted,

/s/ Blaine Larson

Michael Heim

Texas Bar No. 09380923

mheim@hpcllp.com

Alden Harris

Texas Bar No. 24083138

aharris@hpcllp.com

Blaine Larson

Texas Bar No. 24083360

blarson@hpcllp.com

HEIM PAYNE & CHORUSH LLP

609 Main Street, Suite 3200

Houston, Texas 77002

Telephone: (713) 221-2000

Facsimile: (713) 221-2021

*Counsel for Counterclaim Defendant
KT Corporation*

¹ “Defendants” collectively include Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., and TracFone Wireless, Inc. (“Verizon”), AT&T Corp., AT&T Services, Inc., AT&T Mobility LLC, AT&T Mobility II LLC, New Cingular Wireless PCS, LLC, and Cricket Wireless LLC (“AT&T”), and T-Mobile USA, Inc., Sprint Solutions LLC, and Sprint Spectrum LLC (“T-Mobile”); and “Intervenor” collectively includes Ericsson Inc. (“Ericsson”) and Nokia of America Corp. (“Nokia”).

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF on October 28, 2024.

/s/ Blaine Larson
Blaine Larson

CERTIFICATE OF CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I hereby certify that on October 28, 2024, I conferred with counsel for defendants and intervenors regarding the foregoing motion. Counsel for defendants and intervenors are unopposed to the filing of this motion.

/s/ Blaine Larson
Blaine Larson